

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

VOLKSWAGEN AG, VOLKSWAGEN OF  
AMERICA, INC. and BUGATTI  
INTERNATIONAL, S.A.

Plaintiffs and Counterclaim Defendants,

v.

THE BUGATTI, INC.

Defendant and Counterclaim Plaintiff.

**Civil Action No. 05-11067-PBS**

**ASSENTED-TO MOTION FOR ADMISSION PRO HAC VICE**

Pursuant to Local Rule 83.5.3(b), Geri L. Haight, a member in good standing of the bar of this Court and the Commonwealth of Massachusetts, moves to permit Darci J. Bailey, Esq. to appear in this action as counsel for the Defendant.

This Court should allow this motion for the reasons set forth below and in the accompanying affidavit:

1. Darci J. Bailey is a member of the law firm of Mintz Levin Cohn Ferris Glovsky and Popeo P.C. located at 666 Third Avenue, New York, NY 10017. She represents the defendant, The Bugatti, Inc., and is intimately familiar with the facts giving rise to the claims in this lawsuit.
2. Darci J. Bailey is a member in good standing of the bar of New York (admitted in 2000) and admitted to the bar of Connecticut (admitted in 1999).
3. There are no disciplinary proceedings pending against Darci J. Bailey as a member of the bar in any jurisdiction.

4. Darci J. Bailey is familiar with the Local Rules of the United States District Court for the District of Massachusetts.

WHEREFORE, The Bugatti, Inc. respectfully requests that this on for Admission Pro Hac Vice be ALLOWED.

Respectfully submitted,

THE BUGATTI, INC.

By its attorneys,

/s/ Geri L. Haight  
H. Joseph Hameline, BBO # 218710  
Geri L. Haight, BBO # 638185  
Philip J. Catanzano, BBO # 654873  
MINTZ, LEVIN, COHN, FERRIS,  
GLOVSKY AND POPEO, P.C.  
One Financial Center  
Boston, Massachusetts 02111  
(617) 542-6000

Dated: February 10, 2006

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)**

I, Geri L. Haight, affirm that on February 8, 2006, I conferred with counsel for the plaintiffs concerning this motion for admission pro hac vice and received the plaintiffs' assent to it.

/s/ Geri L. Haight  
Geri L. Haight

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on 2/10/06,

/s/ Geri L. Haight

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Defendant and Counterclaim Plaintiff.

**Civil Action No. 05-11067-PBS**

**AFFIDAVIT OF DARCI J. BAILEY IN SUPPORT OF MOTION FOR  
ADMISSION PRO HAC VICE**

I, Darci J. Bailey, hereby depose and state as follows:

1. I am an attorney with the law firm of Mintz Levin Cohn Ferris Glovsky and Popeo located at 666 Third Ave., New York, NY 10017.
2. I am a member in good standing of the bar of the State of New York (admitted in 2000) and admitted to the bar of Connecticut (admitted in 1999).
3. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.
4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Signed under the pains and penalties of perjury this 9th day of February, 2006.

/s/ Darci J. Bailey  
Darci J. Bailey